

PSJ10 Exh 69

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 -----)
5 IN RE: NATIONAL) MDL No. 2804
6 PRESCRIPTION OPIATE)
7 LITIGATION) Case No.
8 -----) 1:17-MD-2804
9)
10 THIS DOCUMENT RELATES TO) Hon. Dan A. Polster
11 ALL CASES)
12 -----)

13 HIGHLY CONFIDENTIAL
14 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

15 VIDEOTAPED DEPOSITION OF
16 MICHAEL STEPHEN DORSEY

17 January 8, 2019

18 Chicago, Illinois

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The videotaped deposition of

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MICHAEL STEPHEN DORSEY, called by the Plaintiffs

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for examination, taken pursuant to the Federal

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Rules of Civil Procedure of the United States

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District Courts pertaining to the taking of

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depositions, taken before CORINNE T. MARUT, C.S.R.

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No. 84-1968, Registered Professional Reporter and a

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Certified Shorthand Reporter of the State of

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Illinois, at the offices of Morgan, Lewis & Bockius

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LLP, Suite 500, 77 West Wacker Drive, Chicago,

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Illinois, on January 8, 2019, commencing at 9:02

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a.m.

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9 REPORTED BY: CORINNE T. MARUT, C.S.R. No. 84-1968

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1 MR. ROTH: Object to form.

2 BY THE WITNESS:

3 A. I don't know if it was a requirement.

4 It was a meeting that we -- that was -- the group
5 of, you know, obviously chain drugstores and
6 manufacturers. So, it was a meeting that you, I
7 guess you went to.

8 BY MR. MELAMED:

9 Q. What happened at those meetings? In a
10 general sense. I'm not asking you to remember
11 specific presentations. But generally, you know,
12 what kind of events occurred during the annual
13 meetings?

14 A. It's during those -- it's meetings
15 really, it's interactions with -- so, it's a forum
16 which allows really for all members, so that would
17 be the retailers as well as wholesalers that would
18 attend, to effectively and efficiently meet and
19 have business discussions all in one place versus
20 flying all over the nation.

21 Q. So, is it fair to say that the primary
22 purpose of attending -- of Actavis' attendance at
23 the NACDS annual meetings was to have personal
24 meetings with wholesalers and/or drugstores?

1 MR. DIAMANTATOS: Objection; form, foundation.

2 BY MR. MELAMED:

3 Q. I'm sorry. Not drugstores. Pharmacies.

4 MR. DIAMANTATOS: Objection; form, foundation.

5 BY THE WITNESS:

6 A. Sorry. Can you just say it one more
7 time.

8 BY MR. MELAMED:

9 Q. The primary purpose of Actavis -- let
10 me -- I'll restate the question.

11 A. Okay.

12 Q. Is your understanding of the primary
13 purpose of Actavis' attendance at the annual
14 meetings to engage in the meetings you were
15 discussing with its -- with your customers?

16 MR. ROTH: Object to form.

17 BY THE WITNESS:

18 A. The -- well, the form of it is together,
19 that you have your customers there so you meet with
20 them as well as you have internal meetings
21 because -- we are spread out throughout the nation,
22 so it affords that opportunity for everyone to be
23 together as well.

24 BY MR. MELAMED:

1 Q. And about how many customers would you
2 meet with at an annual meeting?

3 A. Personally or as a company?

4 Q. Let's start with personally.

5 A. I guess it's depending on my -- who the
6 I guess customer base was. Could be eight and
7 above, could be more.

8 Q. And as a company, approximately, again,
9 I'm not asking you to identify each of the entities
10 you met with during any particular meeting, but
11 approximately how many customers would Actavis as a
12 company meet with at one of these annual meetings?

13 A. Six hours, 12 hours. Maybe there was,
14 let's say, 18 hours of open -- I don't know. I'm
15 estimating if it was 18 or 20 in 30-minute time
16 slots. So, could be up to 40.

17 Q. And would people -- would there be
18 meetings with multiple customers occurring at the
19 same time period with different Actavis employees?

20 A. Separately.

21 Q. Separate meetings. So, for instance,
22 just to talk about time slots. If there was a 9:00
23 a.m. time slot and it was a half hour, is it
24 possible that Actavis would meet with more than one